

August 3, 2011

VIA ELECTRONIC FILING

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: WC Docket No. 11-42 - Lifeline and Link Up Reform and Modernization
CC Docket No. 96-45 - Federal-State Joint Board on Universal Service
WC Docket No. 03-109 - Lifeline and Link Up
NOTICE OF EX PARTE PRESENTATION

Dear Ms. Dortch:

In the above-captioned Lifeline and Link Up Reform and Modernization proceeding, the Commission has sought comment on possible changes to the manner in which Eligible Telecommunications Carriers (ETCs) are required to determine consumer eligibility for Lifeline-supported services. Low-income households may demonstrate their eligibility for Lifeline assistance either based on their income (income-based eligibility) or based on their participation in qualifying assistance programs such as Medicaid, Supplemental Nutritional Assistance Program, and other programs (program-based eligibility). It has been TracFone's experience that nearly all consumers demonstrate their eligibility for Lifeline support using program-based criteria rather than income-based criteria. The purpose of this letter is to provide quantitative data regarding TracFone's Lifeline enrollment.

TracFone commenced offering Lifeline service in several states in 2008 following designation as an ETC by the Commission in ten states and the District of Columbia. Currently TracFone is a designated ETC in 38 states and it provides its SafeLink Wireless[®] Lifeline service in most of those states. Since commencing Lifeline service in 2008, TracFone has enrolled 4,980,253 households in its Lifeline program. Of those, 4,930,380 (99 percent) qualified based on program-based criteria; 49,873 (1 percent) qualified based on income-based criteria.

Pursuant to Section 1.1206(b) of the Commission's Rules, this letter is being filed electronically. If there are questions, please communicate with undersigned counsel.

Respectfully submitted,



Mitchell F. Brecher

cc: Mr. Trent Harkrader
Ms. Kimberly Scardino
Ms. Jamie Susskind
Ms. Cindy Spiers